

IN THE CIRCUIT COURT FOR FREDERICK COUNTY

FREDERICK COUNTY, TO WIT:

ALICE C. KUGLER AND HER HUSBAND,
AND OTHERS

Complainants

VS.

MARY E. OTT, AND HER HUSBAND AND
OTHERS

*
*
*
*
*
*

NO. 19,251 EQUITY

PETITION FOR DECREE PRO CONFESSO

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Petition of Alice C. Kugler, et al, by James McSherry and Robert E. Clapp, Jr., their solicitors, respectfully shows unto your Honors:

FIRST: That on or about the 15th day of October, 1959, your Petitioners filed their Bill of Complaint herein and on the same day an Order was entered herein directing the issuance of a subpoena to the resident defendants returnable on the 30th day of October, 1959 and commanding them to show cause, if any they have, within 15 days thereafter, why a decree ought not to be passed as prayed; that further said Order directed that your Petitioners give notice to the non-resident defendants as recited in the titling hereof, as well as the unknown heirs of Marie Celeste Welty, deceased and the unknown heirs and devisees of J. Bernard Welty, deceased, by order of publication, of the object and substance of the Bill of Complaint, in a newspaper published in Frederick County, Maryland, once a week for four weeks before the 21st day of November, 1959, warning them to show cause, if any they have, in person or by solicitor, on or before the 22nd day of December, 1959, why the decree ought not to be passed as prayed in the Bill of Complaint.

SECOND: That the resident defendants were duly summoned but Bernard Ott, Sr., Joseph E. Elder, unmarried, Madeline W. Wivell and Joseph W. Wivell, her husband, Margaret C. Callan and George B. Callan, Jr., her husband, J. Edward Houck, Jr. and Doris Houck, his wife,